

REMARKS

No amendments are made to the claims. The claims are listed above only for convenience to the Examiner.

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1. Response to Examiner's comments:*Regarding claim 1:*

- 10 Regarding the applicant's previous argument that Russell does not actually disclose "a plurality of configuration tables," the applicant is not attacking the references individually. Rather the applicant is pointing out that a combination used in a USC 103 rejection must meet all limitations of the claims (MPEP 2143.03). Clearly, Russell does not teach a plurality of configuration tables, nor would it be obvious to
- 15 modify Russell's teachings to have a plurality of configuration tables. The applicant argues that such a modification is not addressed in the Examiner's current statement of motivation.

- 20 The Examiner has likened the single configuration table of Russell (that of Fig. 2E, the remaining tables in Figs. 2C-D appear to only further define the CN entries of the table of Fig. 2E.) to the claimed plurality of configuration tables. Thus, the Examiner should explain how a plurality of configuration tables is an obvious modification of Russell.

- 25 The applicant has argued previously and continues to argue that a plurality of configuration tables in Russell would serve no purpose and offer no advantage. Thus, Russell does not teach or suggest a plurality of configuration tables.

Regarding claim 10:

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The Examiner states "Russell does not mention randomly selecting an identity when none of the received identities can be found in a table. However the limitation was not

claimed."

The applicant asserts that the limitation is indeed claimed.

5 Claim 9 states:

choosing an identity via a predetermined method when comparing the predetermined identities of the chosen configuration table to the identities received from the terminal results in no received identities being identical to any of the predetermined identities.

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Claim 10 depends on claim 9 and states:

wherein the predetermined method chooses an identity randomly.

Thus, clearly, claim 10 contains the limitation of

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choosing an identity **randomly** when comparing the predetermined identities of the chosen configuration table to the identities received from the terminal results in no received identities being identical to any of the predetermined identities.

20 And clearly, this is equivalent to "randomly selecting an identity when none of the received identities can be found in a table."

If the Examiner still considers this limitation to not be claimed, the applicant requests a rebuttal to the above.

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2. Rejection of claim 13 under 35 U.S.C. 112, first paragraph:

Regarding the limitation of "user preferences" please refer to paragraphs 27 and 49 of the disclosure, for example.

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From paragraph 27:

...The user can setup the status of each configuration table

C1-C4 in advance in the database DB. For example, the user is at work during the time from AM9:00 to PM5:00, Monday to Friday, so the user can map the contents of the status pointer, C1, to these periods of time. During these periods of time, if the user wants to access network resources with the terminal STA0, the terminal STA0 automatically decides to connect to the network assigned by the configuration table T1 according to the content of the status pointer C. Therefore, the terminal connects to the company wireless network with the identity ID1 at the highest priority. Similarly, the user brings the terminal STA0 back home after work, and accordingly, the corresponding status C2 of the predetermined configuration table T2 is mapped to the time between PM7:00 to PM11:00, Monday to Friday...

15 From paragraph 49:

In practical operation, the configuration tables C1-C4 and network database 20 can be administrated by a front-end software application to allow users convenient establishing, editing, and refreshing of the configuration tables C1-C4 and the network database 20. A wireless network function driver is active in the terminal STA0 and can execute the operation as illustrated by the flowchart diagram in Fig.4. Besides controlling the status pointer C by time, the present invention allows the user to choose status pointers using a simple query program. For example, when the user is connecting to a network with the terminal STA0, the query program asks the user which location the user is in, and then sets the status pointer C accordingly. The present invention gives the user more flexibility in both location and time in setting the priorities of wireless network connections.

30 The bold sections of the above paragraphs make clear that a user can determine the contents of the configuration tables C1-C4 of Fig.3. This concept is encapsulated by

the term "user preferences." Although the term "user preferences" is not used in the disclosure, the concept is thoroughly disclosed.

Furthermore, one of ordinary skill in the art, upon reading claim 13, would know what is meant by "wherein each configuration table corresponds to a unique list of prioritized user preferences..." Dealing with user preferences is a well-known facet of the electronics and programming arts.

Withdrawal of this rejection is respectfully requested.

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3. Rejection of claims 1-12 under 35 U.S.C. 103(a) as being unpatentable over Russell (US20040249915) in view of Mahalingaiah (US6754214):

Regarding claim 1:

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Please see the response to Examiner's comments in section 1 above.

In addition, according to MPEP 2143.01 there must be a suggestion or motivation to modify the references. Currently, the Examiner's statement of motivation reads "The motivation being to enable the system provided the module which contains one mapping table selectable by the security code transferred with the packet that arrives on the module and the termination device connected to the module and receives the packet arriving upon that module."

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The applicant is having difficulty understanding the above statement of motivation for making the combination. The applicant has previously asked for clarification on this statement and has received none. The applicant now formally repeats this request for clarification.

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In the applicant's view, the scopes of Russell and Mahalingaiah are very different. Russell is directed towards the operation of a client device in GPS network. Mahalingaiah is directed to the operation of a module in a network containing a

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plurality of modules. It is the applicant's argument that GPS client devices are not comparable to network modules. GPS client devices communicate with GPS satellites; network modules communicate with each other and further pass traffic between each other. A network module and a GPS satellite *would* be comparable. Thus, Russell and
5 Mahalingaiah, when each considered as a whole, do not provide motivation for making the combination.

Regarding claim 10:

10 This rejection seems to contradict the Examiner's statement of "Russell does not mention randomly selecting an identity when none of the received identities can be found in a table. However the limitation was not claimed."

Please see the response to Examiner's comments in section 1 above.

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Russell does not mention randomly selecting an identity when none of the received identities can be found in a table. The cited section of Russell (page 7, 0079) teaches that on no match the boundaries of the existing networks are changed "providing a more accurate view of the device's coverage areas."

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Since all limitations of a claim must be taught or suggested by the combination for an obviousness rejection to stand, the applicant respectfully requests that this rejection to claim 10 be withdrawn.

25 *Regarding claim 13:*

The cited section of Mahalingaiah (col. 18, lines 15-48) deals with incoming and destination addresses of modules. Such addresses are akin to identification numbers of modules. There is no mention of user preferences nor a unique list of prioritized user
30 preferences nor an operational time and physical location of the terminal.

Clearly, the claim 13 limitation of

each configuration table corresponds to a unique list of prioritized
user preferences for a specific operational time and physical
location of the terminal

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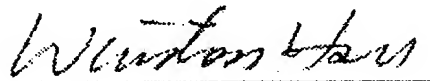
is not met by this section of Mahalingaiah.

Since all limitations of a claim must be taught or suggested by the combination for an
obviousness rejection to stand, the applicant respectfully requests that this rejection to
10 claim 13 be withdrawn.

Conclusion:

Withdrawal of the rejection to claims 1-13 is requested in view of the above
15 arguments. Claims 2-13 are dependent and should be allowed if claim 1 is found
allowable.

Sincerely yours,
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Winston Hsu, Patent Agent No. 41,526
P.O. BOX 506, Merrifield, VA 22116, U.S.A.
25 Voice Mail: 302-729-1562
Facsimile: 806-498-6673
e-mail : winstonhsu@naipo.com

Note: Please leave a message in my voice mail if you need to talk to me. (The time in
30 D.C. is 12 hours behind the Taiwan time, i.e. 9 AM in D.C. = 9 PM in Taiwan.)